

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

and

STATE OF NEW YORK,

Plaintiffs,

v.

TWIN AMERICA, LLC, et al.

Defendants.

Civil Action No.
12-cv-8989 (ALC) (GWG)

ECF Case


**STIPULATION AND [REDACTED] ORDER CONCERNING
INTERROGATORIES AND REQUESTS FOR ADMISSION**

Pursuant to Rules 26(b)(2), 29(b), 33 and 36 of the Federal Rules of Civil Procedure, Rule 33.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, and Section II(F) of the Standing Order for the Pilot Project Regarding Case Management Techniques for Complex Civil Cases in the Southern District of New York, the parties hereby stipulate:

1. Plaintiffs collectively may serve no more than 25 interrogatories on Defendants collectively, and Defendants collectively may serve no more than 25 interrogatories on Plaintiffs collectively; provided, however, that an identical interrogatory served on multiple Defendants or Plaintiffs counts as only one interrogatory.
2. Of the 25 interrogatories, Plaintiffs collectively may serve no more than 10 contention interrogatories, and Defendants collectively may serve no more than 10 contention interrogatories.

3. Plaintiffs collectively may serve no more than 50 requests for admission, and Defendants collectively may serve no more than 50 requests for admission. An identical request for admission served on both Plaintiffs, or on multiple Defendants, shall count as only one request for admission.
4. All contention interrogatories and requests for admission must be served via e-mail no later than February 12, 2014, and answered via e-mail no later than the close of expert discovery, March 14, 2014.
5. Nothing in this stipulation prevents any party from serving contention interrogatories and requests for admission prior to the above-referenced deadline, and the agreement to extend the deadline for such categories of discovery past the fact discovery deadline is not in itself a basis for any party to refuse to respond to contention interrogatories or requests for admission served earlier. The parties reserve their rights to object to contention interrogatories or requests for admission on all other allowable grounds.

Dated: December 30, 2013


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3. Plaintiffs collectively may serve no more than 50 requests for admission, and Defendants collectively may serve no more than 50 requests for admission. An identical request for admission served on both Plaintiffs, or on multiple Defendants, shall count as only one request for admission.
4. All contention interrogatories and requests for admission must be served via e-mail no later than February 12, 2014, and answered via e-mail no later than the close of expert discovery, March 14, 2014.
5. Nothing in this stipulation prevents any party from serving contention interrogatories and requests for admission prior to the above-referenced deadline, and the agreement to extend the deadline for such categories of discovery past the fact discovery deadline is not in itself a basis for any party to refuse to respond to contention interrogatories or requests for admission served earlier. The parties reserve their rights to object to contention interrogatories or requests for admission on all other allowable grounds.

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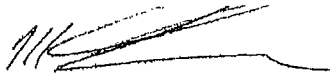
SO ORDERED: _____, 2013

JUDGE GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE

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So Ordered.
December 30, 2013



GABRIEL W. KORENSTEIN
United States Magistrate Judge